

July 18, 2001

Mr. Denny Knigga
Batesville Manufacturing, Inc.
1000 East Pearl Street
Batesville, Indiana 47006

Re: AA 137-14448-00016
Administrative Amendment to
CP 137-10452, Plt ID 137-00016

Dear Mr. Knigga:

Batesville Manufacturing, Inc. (Options Plant) was issued a Construction Permit (CP137-10452-00016) on April 29, 1999 for the construction of surface coating lines used for metal and wood urns manufacturing, to be located at 705 East Pearl Street, Batesville, Indiana 47006. On May 14, 1999, Batesville Manufacturing Inc., made a Petition for Administrative Review of the issued Construction Permit CP137-10452-00016. In the petition, Batesville Manufacturing, Inc. objected to the following conditions.

- (a) The interpretation that the Options Plant should be considered part of the same source as Batesville Manufacturing's Assembly Plant (Operation Condition No. 8).
- (b) The requirement for visible emission notations of all surface coating lines once per shift (Operation Condition No. 11).
- (c) The apparent interpretation that the MACT synthetic minor limit applies to all lines in total, rather than each line individually (Operation Condition No. 13); and
- (d) The various requirements related to the dry filters for the metal and wood surface coating lines, including the requirements for daily inspections, continuous operation, and the development and implementation of a preventative maintenance plan (Operation Condition No. 12).

IDEM, OAQ, has agreed to settle this appeal through amendment of the permit (changes are bolded and deletions are struck-through for emphasis):

1. The interpretation that the Options Plant and the Assembly Plant are one source remains. No change is made to Condition No. 8.
2. Operation Condition No. 11 has been deleted and replaced by the following condition:

Visible Emission Notations

11. ~~That visible emission notations of all exhaust to the atmosphere from surface coating lines shall be performed once per working shift. A trained employee will record whether~~

~~emissions are normal or abnormal.~~

- ~~_____ (a) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, 80% of the time, the process is in operation, not counting start up or shut down time.~~
- ~~_____ (b) In the case of batch or discontinuous operation, readings shall be taken during that part of the operation specified in the facility's specific condition prescribing visible emissions.~~
- ~~_____ (c) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal and abnormal visible emissions for that specific process.~~
- ~~_____ (d) The Preventive Maintenance Plan for this facility shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.~~
- (a) **The dry filters for particulate matter overspray control shall be properly in place and maintained to ensure integrity and particulate loading of the filters at all times when the metal and wood surface coating lines are in operation.**
- (b) **Batesville Manufacturing shall implement an operator-training program.**
 - (1) **All operators that perform gel coat spray operations, resin spray operation, paint spray operations, chopping operations or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of stay agreement. All new operators shall be trained upon hiring or transfer.**
 - (2) **Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators, and training records shall be maintained on site or available within one hour for inspection by IDEM.**
 - (3) **All operators shall be given refresher training annually.**
- (c) **Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.**
- (d) **To document compliance with Condition b(1) through b(3), Batesville Manufacturing shall maintain a copy of the operator-training program, training records, and those additional inspections prescribed by the Preventive Maintenance Plan.**

2. Operation Condition No. 12 is amended as follows:

That pursuant to 326 IAC 6-3 (Process Operations)

~~———— (a) ——— The dry filters for particulate matter overspray control shall be in operation at all times when the metal and wood surface coating lines are in operation.~~

(b a) The metal and wood surface coating lines shall comply with 326 IAC 6-3-2(c) using the following equation:

$$E = 4.10 P^{0.67} \quad \text{where: } E = \text{rate of PM emissions in pounds per hour,} \\ P = \text{process weight rate in tons per hour}$$

~~(c) ——— Daily inspections shall be performed to verify the placement, integrity and particulate loading of the filters.~~

~~(d) ——— Additional inspections and preventative measures shall be performed as prescribed in the Preventative Maintenance Plan~~

3. Operation Condition No. 13 is amended as follows:

13. MACT Synthetic Minor Limitation

That the input of any single and total hazardous air pollutants (HAP), including clean up solvent, minus the HAP solvent shipped out, delivered to ~~the applicators of the treatment and surface coating facility, for the~~ **each** metal and wood surface coating lines, shall be limited to less than 10 and 25 tons per twelve (12) month period, respectively, rolled on a monthly basis. Therefore, the Maximum Achievable Control Technology (MACT) requirements of 326 IAC 2-4.1-1 will not apply.

4. Report Forms on Pages 8 and 9 of 13 are also amended to reflect the changes made to Operation Condition No. 13.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Quarterly Report

Source Name: Batesville Manufacturing, Inc. (Options Plant)
Source Address: 705 East Pearl Street, Batesville, IN 47006
Mailing Address: 1000 East Pearl Street, Batesville, IN 47006
Permit No.: CP-137-10452-00016
Facility: Metal and Wood Surface Coating Lines of Options Plant.
Parameter: Single hazardous air pollutants (HAPs)
Limit: The single HAP usage is limited to less than 10 tons per twelve (12) month period, rolled on a monthly basis **for each metal and wood surface coating lines**. During the first 11 months of this permit, the single HAP usage shall be limited such that the total single HAP usage divided by the accumulated months of operation shall not exceed 0.8325 tons per month.

YEAR: _____

| Month | Total Single HAP Emissions This Month (tons) | Previous 11 Month Single HAP Emissions (tons) | 12 Month Total Single HAP Emissions (tons) |
|---------|--|---|--|
| Month 1 | | | |
| Month 2 | | | |
| Month 3 | | | |

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

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Facility: Metal and Wood Surface Coating Lines of Options Plant.
Parameter: Total hazardous air pollutants (HAPs)
Limit: The total HAP usage is limited to less than 25 tons per twelve (12) month period, rolled on a monthly basis **for each metal and wood surface coating lines**. During the first 11 months of this permit, the total HAP usage shall be limited such that the total HAP usage divided by the accumulated months of operation shall not exceed 2.0825 tons per month.

YEAR: _____

| Month | Total HAP Emissions This Month (tons) | Previous 11 Month HAP Emissions (tons) | 12 Month Total HAP Emissions (tons) |
|---------|---|--|---|
| Month 1 | | | |
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9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment with the original permit.

Sincerely,

Original Signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

APD

cc: File - Ripley County
Ripley County Health Department
Air Compliance Section Inspector - Joe Foyst
Compliance Data Section - Karen Nowak
Permit Tracking - Janet Mobley
Air Programs Section - Michelle Boner
Office of Legal Counsel - Candace Vogel

**CONSTRUCTION PERMIT
AND ENHANCED NEW SOURCE REVIEW (ENSR)
Office of Air Quality**

**Batesville Manufacturing, Inc. (Options Plant)
705 East Pearl Street
Batesville, Indiana 47006**

is hereby authorized to construct

- (a) One (1) metal urn surface coating line capable of coating 36 urns per hour, consisting of two (2) spray booths, identified as P-M-1 and P-M-2, each utilizing a high volume low pressure (HVLP) spray equipment and dry filters for particulate matter control, and exhausting through one (1) stack ID S-M-1;
- (b) One (1) wood urn surface coating line capable of coating 32 urns per hour, consisting of two (2) spray booths, identified as P-W-1 and P-W-2, each utilizing a high volume low pressure (HVLP) spray equipment and dry filters for particulate matter control, and exhausting through one (1) stack ID S-W-1; and
- (c) One (1) baghouse, identified as BW-1, used to control the existing wood working facilities (WW-1) with a maximum flow rate of 21,000 cfm.

This permit is issued to the above mentioned company (herein known as the Permittee) under the provisions of 326 IAC 2-1 and 40 CFR 52.780, with conditions listed on the attached pages.

| | |
|--|-------------------------------|
| Construction Permit No.: CP-137-10452-00016 | |
| Issued by: Paul Dubenetzky, Branch Chief Office of Air Management | Issuance Date: April 29, 1999 |
| Administrative Amendment 137-14448 | Affected Pages: 5, 6, 8, 9 |
| Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality | Issuance Date: July 18, 2001 |

Annual Emission Reporting

9. That pursuant to 326 IAC 2-6 (Emission Reporting), the Permittee must annually submit an emission statement for the source. This statement must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31.

Opacity Limitations

10. That pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.
11. (a) The dry filters for particulate matter overspray control shall be properly in place and maintained to ensure integrity and particulate loading of the filters at all times when the metal and wood surface coating lines are in operation.
- (b) Batesville Manufacturing shall implement an operator-training program.
- (1) All operators that perform gel coat spray operations, resin spray operation, paint spray operations, chopping operations or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of stay agreement. All new operators shall be trained upon hiring or transfer.
 - (2) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators, and training records shall be maintained on site or available within one hour for inspection by IDEM.
 - (3) All operators shall be given refresher training annually.

- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.
 - (d) To document compliance with Condition b(1) through b(3), Batesville Manufacturing shall maintain a copy of the operator-training program, training records, and those additional inspections prescribed by the Preventive Maintenance Plan.
12. That pursuant to 326 IAC 6-3 (Process Operations):
- (a) The metal and wood surface coating lines shall comply with 326 IAC 6-3-2(c) using the following equation:
$$E = 4.10 P^{0.67}$$
where: E = rate of PM emissions in pounds per hour,
P = process weight rate in tons per hour
- MACT Synthetic Minor Limitation
13. That the input of any single and total hazardous air pollutants (HAP), including clean up solvent, minus the HAP solvent shipped out, delivered to each metal and wood surface coating lines, shall be limited to less than 10 and 25 tons per twelve (12) month period, respectively, rolled on a monthly basis. Therefore, the Maximum Achievable Control Technology (MACT) requirements of 326 IAC 2-4.1-1 will not apply.
- BACT Synthetic Minor Limitation
14. That input volatile organic compounds (VOC) including clean up solvent, minus the VOC solvent shipped out, delivered to the applicators of the metal coating line shall be limited to less than 25 tons per twelve (12) month period, rolled on a monthly basis. Therefore, the Best Available Control Technology (BACT) requirements of 326 IAC 8-1-6 will not apply.
- Volatile Organic Compound (VOC) Limitations
15. That pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet coating), the surface coatings applied to wood furniture and/or wood components in the wood surface coating line shall utilize one or more of the following application methods:
- | | |
|----------------------------------|--|
| Airless Spray Application | Air-Assisted Airless Spray Application |
| Electrostatic Spray Application | Electrostatic Bell or Disc Application |
| Heated Airless Spray Application | Roller Coating |
| Brush or Wipe Application | Dip-and-Drain Application |
| High Volume Low Pressure HVLP | Aerosol Spray Cans |
- High volume low pressure spray is an acceptable alternative application of air-assisted airless spray. High volume low pressure (HVLP) spray means technology used to apply coating to a substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.
- Reporting Requirements
16. That a log of information necessary to document compliance with operation permit condition nos. 8, 13, and 14 shall be maintained. These records shall be kept for at least the past 36 month period and made available upon request to the Office of Air Quality (OAQ).
- (a) A quarterly summary shall be submitted to:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
Office of Air Quality
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Title / Position: _____
Signature: _____
Date: _____
Phone: _____

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